

REMARKS

Applicants have amended claim 1 and added new claim 3.

Claim 1 has been rejected under 35 USC 102(b) as anticipated by U.S. Patent Application Publication No. 2001/0040645 (Yamazaki). Applicants respectfully traverse this rejection.

Claim 1 as amended states that the white electroluminescent emissive layer is disposed continuously over the red, green and blue pixels. This amendment finds support, for example, at page 4, lines 14-17, of the specification, which explains that the claimed white electroluminescent emissive layer makes it unnecessary to isolate the layer as islands corresponding to R, G and B colors. The Examiner equates Yamazaki's EL layer 51 to the claimed white electroluminescent layer. Applicants respectfully disagree.

The claimed white electroluminescent layer is shared by the red, green and blue electroluminescent elements and thus covers the red, green and blue pixels without being divided into "islands." Each of Yamazaki's EL layers 51 is provided for one corresponding pixel and does not cover more than one pixel, contrary to the claim language. See, for example, FIG. 2 of Yamazaki.

The rejection of claim 1 under 35 USC 102(b) on Yamazaki should be withdrawn because Yamazaki does not teach or suggest the claimed white electroluminescent layer.

Claim 2 has been rejected under 35 USC 103(a) as unpatentable over Yamazaki in view of U.S. Patent No. 4,685,808 (Nakazawa). Applicants respectfully traverse this rejection.

Claim 2 states that a light transmittance of the red filter layer is 50% or lower at 584 nm, a light transmittance of the green filter layer is 50% or lower between 482 nm and 588 nm, and a light transmittance of the blue filter layer is 50% or lower between 407 nm and 516 nm. The Examiner admits that Yamazaki does not teach or suggest the claimed transmittances of the red, green and blue filter layers. To overcome the deficiencies of Yamazaki, the Examiner relies on Nakazawa and contends that curve 7 in Nakazawa's FIG. 2 and curves 5 and 3 in Nakazawa's FIG. 3 disclose the claimed transmittances of the red, green and blue filter layers, respectively. Applicants respectfully disagree.

With respect to the claimed transmittance of the red filter layer, which the Examiner equates to Nakazawa's curve 7 in FIG. 2, the curves 1-10 in Nakazawa's FIG. 2 all represent "the spectral reflectances of objects having the respective indicated colors." See, column 1, lines 50-54, of Nakazawa. Accordingly, curve 7 of Nakazawa's FIG. 2 is not a transmittance of a filter layer as claimed. The only transmittance-related property shown in Nakazawa's FIG. 2 is curve Z, which is the product of transmittance of filter 7 and sensitivity of photodiode 8, and even this leads to a transmittance close to 100% at 584 nm, contrary to the claim language.

With respect to the claimed transmittances of the green and blue filter layers, which the Examiner equates to Nakazawa's curves 5 and 3 in FIG. 3, all the curves in Nakazawa's FIG. 3 are reflectance spectra of an object and not transmittance spectra of a filter layer as claimed. See, column 2, lines 51-55, of Nakazawa.

Furthermore, applicants point out that persons of ordinary skill in the art would not have been motivated to combine the teachings of Yamazaki and Nakazawa because Nakazawa teaches the use of characteristic reflectance spectra of objects of different colors for proper color sensing that is not relevant to manipulating the transmittance of an optical filter of a color display.

The rejection of claim 2 under 35 USC 103(a) over Yamazaki and Nakazawa should be withdrawn because Yamazaki and Nakazawa together do not teach or suggest the claimed transmittances of the red, green and blue filter layers.

New claim 3 adds the limitations of the white electroluminescent layer of claim 1 to claim 2.

In light of the above, a Notice of Allowance is solicited.

In the event that the transmittal letter is separated from this document and the Patent and Trademark Office determines that an extension and/or other relief is required, applicants petition

for any required relief including extensions of time and authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to

Deposit Account No. 03-1952, referencing Docket No. **492322015800**.

Respectfully submitted,

Dated: July 14, 2005

By:



Barry E. Bretschneider
Registration No. 28,055

Morrison & Foerster ^{LLP}
1650 Tysons Boulevard, Suite 300
McLean, VA 22102-3915
Telephone: (703) 760-7743
Facsimile: (703) 760-7777